

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



Office of Pesticide Programs

**MEMORANDUM**

7/15/2020

**SUBJECT:** Acute Toxicity Review for TM 70, EPA Reg. No.: 833-RI

**FROM:** Lindsay O'Dell  
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Product Science Branch  
Antimicrobials Division (7510P)

**THRU:** Jenny Tao, Senior Scientist (Acute Toxicology)  
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07/15/2020

**TO:** Jacqueline Hardy, PM Team 34 / Stacey Grigsby  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

Registrant: Alex C. Fergusson LLC		
Decision No.: 561327	Submission No.: 1048286	E-Sub No.: 47160
DP No.: 457704		Action Code: A540
MRID No(s).: -		

Formulation from label			
PC code(s)	CAS #(s)	Active Ingredient(s)	% weight
001501	64-17-5	Ethanol	66.59%
047501	67-63-0	Isopropyl alcohol	3.73%
		Other Ingredients	29.68%
		Total	100%

## **I. BACKGROUND**

The Registrant, Alex C. Fergusson LLC, has submitted an application for pesticide registration for their product: *TM 70*, EPA Reg. No. 833-RI. To fulfill the acute toxicity data requirements, the registrant has used the “Cite All” method of support. Additionally, EPA Reg. No. 73232-4 was identified as substantially similar in composition and use to the proposed product. This end use product is formulated as a ready to use cleaner and sanitizer for food contact surfaces.

## **II. FINDINGS/RECOMMENDATIONS**

The Agency finds the cited product, EPA Reg. No. 73232-4, toxicological relevant to the proposed product. The data conducted on the cited product and other relevant data in the Agency’s database was used to determine the most protective precautionary statements for the proposed product.

	Cited Product EPA Reg. No. 73232-4	Proposed Product EPA Reg. No. 833-RI
Ethanol	62.5%	66.59%
Isopropyl alcohol	7.5%	3.73%

### **1.The acute toxicity profile of TM 70, EPA Reg. No. 833-RI is currently:**

Study	MRID	Toxicity Category	Status
Acute Oral Toxicity	CITE ALL	III	Cited
Acute Dermal Toxicity	CITE ALL	III	Cited
Acute Inhalation Toxicity	CITE ALL	IV	Cited
Primary Eye Irritation	CITE ALL	III	Cited
Primary Skin Irritation	CITE ALL	IV	Cited
Dermal Sensitization	CITE ALL	Nonsensitizer	Cited

## **III. CONCLUSION**

The acute toxicity data requirements have been met to support the registration of EPA. Reg. No. 833-RI.

## **IV. PRODUCT LABELING**

The proposed draft label needs to be revised to include the following, according to the Agency’s Label Review Manual (<https://www.epa.gov/pesticide-registration/label-review-manual>):

1. Signal Word: “CAUTION”

2. The statement, "Keep Out of Reach of Children", is required. It should appear immediately above the front-panel signal word "CAUTION".

3. The following human-hazard precautionary statements.

#### **PRECAUTIONARY STATEMENTS**

##### **HAZARDS TO HUMANS AND DOMESTIC ANIMALS:**

**CAUTION:** Harmful if swallowed and absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

#### **4. FIRST AID STATEMENT:**

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything to an unconscious person.

**IF IN EYES:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. For general information on product use, etc., call the National Pesticides Information Center at 1-800-858-7378. You may also contact the poison control center at 1-800-222-1222 for emergency medical treatment information.

~~CONFIDENTIAL ATTACHMENT NOTE TO PM~~

The precautionary statements of the cited product (73232-4) do not align with the acute toxicity DER dated 2/13/2017 under data package number 438006.